

BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. OA 2004-124

CORINNE JALEH COOK
a.k.a. CORINNE J. COOK,
a.k.a. CORINNE NELSON
P. O. Box 954
Carlsbad, California 92008

Occupational Therapy Certificate No. OTA 1348


Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the California Board of Occupational Therapy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 24, 2009.

It is so ORDERED June 24, 2009.


FOR THE CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General.
of the State of California
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CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. OA 2004-124

13 CORINNE JALEH COOK,
a.k.a. CORINNE J. COOK,
14 a.k.a. CORINNE NELSON
P. O. Box 954
15 Carlsbad, California 92008

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16 Occupational Therapy Certificate No. OTA 1348

17 Respondent.

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19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
20 above-entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Heather Martin ("Complainant") is the Executive Officer of the California
23 Board of Occupational Therapy. She brought this action solely in her official capacity and is
24 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
25 by Janice K. Lachman, Supervising Deputy Attorney General.

26 2. Respondent Corinne Jaleh Cook, also known as Corinne J. Cook and
27 Corinne Nelson ("Respondent"), is representing herself in this proceeding and has chosen not to
28 exercise her right to be represented by counsel.

3. On or about March 1, 2004, the California Board of Occupational Therapy issued Occupational Therapy Certificate Number OTA 1348 to Respondent. Respondent's occupational therapy certificate will expire on November 30, 2010, unless renewed.

JURISDICTION

4. Accusation No. OA 2004-124 was filed before the California Board of Occupational Therapy ("Board"), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on April 27, 2009. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. OA 2004-124 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. OA 2004-124. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. OA 2004-124.

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9. Respondent agrees that her occupational therapy certificate is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Occupational Therapy Certificate Number OTA 1348 issued to Respondent Corinne Jaleh Cook, also known as Corinne J. Cook and Corinne Nelson, is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions:

1. **Obey All Laws.** Respondent shall obey all federal, state, and local laws and regulations governing the practice of occupational therapy in California. Respondent shall submit, in writing, a full detailed account of any and all violations of the law to the Board within five (5) days of occurrence.

1 2. **Compliance with Probation and Quarterly Reporting.** Respondent
2 shall fully comply with the terms and conditions of probation established by the Board and shall
3 cooperate with representatives of the Board in its monitoring and investigation of Respondent's
4 compliance with probation. Respondent, within ten (10) days of completion of the quarter, shall
5 submit quarterly written reports to the Board on a Quarterly Report of Compliance form obtained
6 from the Board.

7 3. **Personal Appearances.** Upon reasonable notice by the Board,
8 Respondent shall report to and make personal appearances at times and locations as the Board
9 may direct.

10 4. **Notification of Address and Telephone Number Change(s).**
11 Respondent shall notify the Board, in writing, within five (5) days of a change of residence or
12 mailing address, of her new address and any change in work and/or home telephone numbers.

13 5. **Tolling for Out-of-State Practice, Residence or In-State Non-Practice.**
14 In the event Respondent should leave California to reside or to practice outside the State for more
15 than thirty (30) days, Respondent shall notify the Board or its designee in writing within ten (10)
16 days of the dates of departure and return. All provisions of probation other than the quarterly
17 report requirements, examination requirements, and education requirements, shall be held in
18 abeyance until Respondent resumes practice in California. All provisions of probation shall
19 recommence on the effective date of resumption of practice in California.

20 6. **Notification to Employer(s).** When currently employed or applying for
21 employment in any capacity in any health care profession, Respondent shall notify her employer
22 of the probationary status of Respondent's license. This notification to the current employer
23 shall occur no later than the effective date of the Decision. Respondent shall notify any
24 prospective health care employer of her probationary status with the Board prior to accepting
25 such employment. This notification shall be made by providing the employer or prospective
26 employer with a copy of the Board's Accusation and Stipulated Settlement and Disciplinary
27 Decision and Order.

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1 Respondent shall cause each health care employer to submit quarterly reports to
2 the Board. The reports shall be on a form provided by the Board, shall include a performance
3 evaluation and such other information as may be required by the Board.

4 Respondent shall notify the Board, in writing, within five (5) days of any change
5 in employment status. Respondent shall notify the Board, in writing, within five (5) days if she is
6 terminated from any occupational therapy or health care related employment with a full
7 explanation of the circumstances surrounding the termination.

8 **7. Employment Requirements and Limitations.** During probation,
9 Respondent shall work in her licensed capacity in the State of California. This practice shall
10 consist of no less than (6) continuous months and of no less than twenty (20) hours per week.

11 While on probation, Respondent shall not work for a registry or in any private
12 duty position, except as approved, in writing, by the Board. Respondent shall work only on a
13 regularly assigned, identified, and pre-determined work site(s) and shall not work in a float
14 capacity except as approved, in writing, by the Board.

15 **8. Supervision Requirements.** Respondent shall obtain prior approval from
16 the Board, before commencing any employment, regarding the level of supervision provided to
17 the respondent while employed as an occupational therapist or occupational therapy assistant.

18 Respondent shall not function as a supervisor during the period of probation
19 except as approved, in writing, by the Board.

20 **9. Maintenance of Valid License.** Respondent shall, at all times while on
21 probation, maintain an active current license with the Board, including any period during which
22 license is suspended or probation is tolled.

23 **10. Cost Recovery.** Respondent shall reimburse the Board its costs of
24 \$656.50. Respondent shall make timely payments as directed in the Board's Decision pursuant
25 to Business and Professions Code section 125.3. Failure to make payments in accordance with
26 any formal agreement entered into with the Board or pursuant to any Decision by the Board shall
27 be considered a violation of probation. The Board shall not renew or reinstate the license of any
28 respondent who has failed to pay all the costs as directed in a Decision.

1 11. **Violation of Probation.** If Respondent violates probation in any respect,
2 the Board, after giving Respondent notice and opportunity to be heard, may revoke probation and
3 carry out the disciplinary order which was stayed. If an accusation or a petition to revoke
4 probation is filed against Respondent during probation, the Board shall have continuing
5 jurisdiction until the matter is final, and the period of probation shall be extended until the matter
6 is final.

7 12. **Completion of Probation.** Upon successful completion of probation,
8 Respondent's license will be fully restored.

9 13. **Chemical Dependency Support/Recovery Groups.** Within five (5) days
10 of the effective date of the Decision, Respondent shall begin attendance at a chemical
11 dependency support group (e.g., Alcoholics Anonymous, Narcotics Anonymous). Verified
12 documentation of attendance, three (3) times weekly, shall be submitted by Respondent with
13 each quarterly report. Respondent shall continue attendance in such a group for the duration of
14 probation or until such time that the Board provides written notification that support group
15 attendance shall cease.

16 14. **Abstain From Controlled Substances.** Respondent shall completely
17 abstain from the personal use or possession of controlled substances, as defined in the California
18 Uniform Controlled Substances Act, and dangerous drugs as defined in section 4021 and 4022 of
19 the Business and Professions Code, except when lawfully prescribed by a licensed practitioner
20 for a bona fide illness. Respondent shall have sent to the Board, in writing and within fourteen
21 (14) days, by the prescribing health professional, a report identifying the medication, dosage, the
22 date the medication was prescribed, the Respondent's prognosis, the date the medication will no
23 longer be required, and the effect on the recovery plan, if appropriate.

24 15. **Abstain From Use of Alcohol.** Respondent shall completely abstain from
25 the use of alcoholic beverages during the period of probation.

26 16. **Submit Biological Fluid Samples.** Respondent shall immediately submit
27 to biological fluid testing, at Respondent's cost, upon request by the Board or its designee. There

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1 will be no confidentiality in the test results; positive test results will be immediately reported to
2 the Board and the respondent's current employer.

3 ACCEPTANCE

4 I have carefully read the Stipulated Settlement and Disciplinary Order. I
5 understand the stipulation and the effect it will have on my occupational therapy certificate. I
6 enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and
7 intelligently, and agree to be bound by the Decision and Order of the California Board of
8 Occupational Therapy.

9 DATED: _____

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11 *(Respondent signature*
12 *received at DOT*
13 *6/15/09.)*

Corinne Cook
CORINNE JALEH COOK (Respondent)

14 ENDORSEMENT

15 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
16 submitted for consideration by the California Board of Occupational Therapy of the Department
17 of Consumer Affairs.

18 DATED: 6/15/09

19 EDMUND G. BROWN JR., Attorney General
20 of the State of California

21 ALFREDO TERRAZAS
22 Senior Assistant Attorney General

23 *Janice K. Lachman*
24 JANICE K. LACHMAN
25 Supervising Deputy Attorney General

26 Attorneys for Complainant